



RECRUITMENT DATA PROTECTION AND PRIVACY POLICY

We take our responsibility for holding and using your data seriously and are committed to respecting and safeguarding your privacy and the personal data that you share with us.

This policy sets out the overarching principles of how we handle the personal data of our candidates for the purposes of recruitment. For the purposes of this policy, references to 'candidates' includes individuals registered as part of our 'future talent pipeline', job alerts and job applications.

It should be read in conjunction with the following policies, copies of which are available on the Brett Website, which cover certain principles in more detail:

- Data Protection Policy
- Recruitment and Selection Policy.

1. WHO DOES THIS POLICY APPLY TO?

This policy applies to candidates of Robert Brett & Sons Limited and its subsidiaries ("**Brett**").

2. WHAT DATA IS COLLECTED?

Personal data means any information about you from which you can be identified. It does not include data where your identity has been removed (anonymous data).

We may collect, store and use the following categories of personal data in connection with our recruitment process:

- Personal details, such as name, address and contact details, including email address and telephone number, date of birth and gender.
- Information provided during your recruitment, such as previous work history, education and training, and confidential employment references with previous employers.
- Aptitude and behavioural preference questionnaire test results.
- Information relating to remuneration, including entitlement to benefits such as pensions, company cars or insurance cover.
- Identification documentation and images such as proof of eligibility to work in the UK and official identification references.

We may also collect, store and use the following types of more sensitive personal data:

- Equal opportunities monitoring information, including information such as your gender, race or national or ethnic origin.
- Information about your health, including any medical condition or disability.



3. PURPOSE AND LEGAL BASIS OF PROCESSING

We will only collect personal data necessary for the legitimate interests of the recruitment process and to comply with our legal obligations as an employer.

We may use the personal data we collect about you to:

- Assess your skills, qualifications and suitability for the role.
- Carry out background and reference checks, where applicable.
- Communicate with you about the recruitment process.
- Keep records related to our recruitment processes.
- Respond to and defend against legal claims.
- Enter into an employment contract with you.
- Comply with legal or regulatory obligations, such as proof of entitlement to work in the UK.

Sensitive personal data requires higher levels of protection. We need to have further justification for collecting, storing, and using this type of personal data. We have in place appropriate safeguards which we are required by law to maintain when processing such data. In general, we will not process particularly sensitive personal data about you unless it is necessary for performing or exercising obligations or rights in connection with assessing your application. We will use your sensitive personal data in the following ways:

- We may use data about your physical or mental health, or disability status to consider if we need to provide appropriate adjustments during the recruitment process or in the workplace.
- We may use data about your gender, race or national or ethnic origin to ensure meaningful equal opportunity monitoring and reporting - this data is anonymised and does not form any part of the decision-making process, it forms part of diversity monitoring only.

4. DATA SHARING

Applicant data may be shared internally within Brett as necessary for those involved in the recruitment process. This includes but is not limited to, the People Team, hiring managers, payroll and senior leadership. Where access to the data is necessary or required by law to carry out their roles. We may also share applicant data with third parties from time to time to assist with candidate screening and assessment, pre-employment references and eligibility to work in the UK.

5. DATA RETENTION

Your data will be stored for up to 12 months by default, you may request to remove your data before this period. After this period, we will securely destroy your personal data in accordance with our Data Retention and Records Management Policy.



We may extend this period, with your agreement, to allow us to highlight suitable roles to you when they arise. You can opt-out of this at any time.

6. CANDIDATE RIGHTS AND REQUESTS

Under certain circumstances, by law you have the right to request access to, verify, correct or request erasure of your personal data, object to the processing of your personal data or request that we transfer a copy of your personal data to another party. If you wish to make such a request, please contact General Counsel, Susan Kitchin in writing who will process your request in accordance with our Data Request Policy.

7. COMMUNICATION AND TRAINING

A copy of this policy will be kept available to all prospective employees on the Brett Group website.

8. REVIEW

This policy was reviewed in October 2024. To ensure the policy remains relevant it will be reviewed periodically to reflect changes in legislation and good practice. Where opportunities for improvement are identified these will be discussed at the appropriate forum.

9. CONTACT

Any questions relating to this policy should be directed by e mail to Susan Kitchin (susan.kitchin@brett.co.uk), General Counsel or to the People Team (recruitment.talent@brett.co.uk).